

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Kevin Lucas,

Plaintiff,

v.

United Recovery Systems, LP,

Defendant.

Case No.:

Judge:

**COMPLAINT FOR DAMAGES  
UNDER THE FAIR DEBT COLLECTION  
PRACTICES ACT AND OTHER  
EQUITABLE RELIEF**

**JURY DEMAND ENDORSED HEREIN**

**JURISDICTION AND VENUE**

1. Jurisdiction is founded on 28 U.S.C. §1331 pursuant to the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. §1692. Venue is proper because a substantial part of the events giving rise to this claim occurred in this judicial district.

**FACTS COMMON TO ALL COUNTS**

2. Plaintiff is a natural person who resided in Oswego, Illinois at all times relevant to this action.
3. Defendant is a Texas Limited Partnership that maintained its principal place of business in Houston, Texas at all times relevant to this action.
4. Defendant is a “debt collector” as defined by 15 U.S.C. §1692a(6).
5. As described below, Defendant attempted to collect from Plaintiff a “debt” as defined by 15 U.S.C. §1692a(5).
6. Plaintiff is a “consumer” as defined by 15 U.S.C. §1692a(3).
7. On or around June 23, 2009, Defendant telephoned Plaintiff’s ex-girlfriend’s mother (“Brenda”) in connection with the collection of the debt without Plaintiff’s consent.

8. During this communication, Defendant told Brenda that Defendant was a financial company.
9. During this communication, Defendant falsely represented that Plaintiff had given Defendant Brenda's telephone number as a reference on Plaintiff's account and stated that Defendant had tried to reach Plaintiff several times, but Plaintiff would not return Defendant's call.
10. Defendant caused Plaintiff emotional distress.
11. Defendant violated the FDCPA.

**COUNT ONE**

**Violation of the Fair Debt Collection Practices Act**

12. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.
13. Defendant violated 15 U.S.C. §1692c(b) by communicating with a third party in connection with the collection of the debt without Plaintiff's consent.

**COUNT TWO**

**Violation of the Fair Debt Collection Practices Act**

14. Plaintiff incorporates each of the preceding allegations as if specifically stated herein.
15. Defendant violated 15 U.S.C. §1692d by engaging in conduct the natural consequence of which was to harass, oppress, or abuse Plaintiff in connection with the collection of a debt.

**JURY DEMAND**

16. Plaintiff demands a trial by jury.

**PRAYER FOR RELIEF**

17. Plaintiff prays for the following relief:
  - a. Judgment against Defendant for actual damages, statutory damages, and costs and reasonable attorney's fees pursuant to 15 U.S.C. §1692k.
  - b. For such other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Legal Helpers, P.C.

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